

## Jump, Christine

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**From:** Jump, Christine  
**Sent:** Friday, March 13, 2015 3:10 PM  
**To:** 'Michael Stephenson'  
**Cc:** SMITH, MARTIN L  
**Subject:** RE: Clean Harbors IRM activities

Thank you for the figure and data.

Submittal of the other requested information by March 30<sup>th</sup> is acceptable.

Chris Jump, L.G.  
Waste Remediation and Permitting Branch  
US EPA, Region 7  
jump.chris@epa.gov  
(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

**From:** Michael Stephenson [mailto:mstephenson@cameron-cole.com]  
**Sent:** Friday, March 13, 2015 2:40 PM  
**To:** Jump, Christine  
**Cc:** SMITH, MARTIN L  
**Subject:** RE: Clean Harbors IRM activities

Hello Chris,

Attached please find the map of PCE results obtained from samples collected in the area south of Building C. We are still awaiting the results of additional samples collected at depth to in Grid D3 and C3. My hope was to have that data prior to sending you this map but am sending it now at your request. We can fill in the pending results once we have them and resend.

I will forward your concerns regarding notification to the remainder of the project team to insure this information is flowing through the appropriate channels and gets in your hands sooner.

I will not be able to comply with the March 23 date proposed for submittal of updated schedules, dates of drum discoveries, confirmation sampling data and backfill dates. I will be travelling next week and I will need to confer with other members of the project team to get the answers you are seeking. My hope would be to have the requested information to you by March 30 if not sooner. I will have others start pulling together this information in my absence next week.

Please let me know if this works for you.

Thanks,

Mike Stephenson  
Principal Scientist  
Cameron-Cole LLC



50 Hegenberger Loop  
Oakland CA 94621  
office - (510) 777-1864  
mobile - (510) 773-9895

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**From:** Jump, Christine [<mailto:Jump.Chris@epa.gov>]  
**Sent:** Friday, March 13, 2015 9:31 AM  
**To:** Michael Stephenson; SMITH, MARTIN L  
**Subject:** Clean Harbors IRM activities

Mike-

You indicated verbally on Wednesday the 11th that you will be sending a figure and sample results soon for ongoing activities associated with the sampling conducted to delineate the Building C excavation contamination south of the water line and the grid sampling required due to the stockpiling of excavated sediments. EPA looks forward to reviewing this information as soon as it is available.

EPA has encouraged open communication and sharing of data on this IRM project from the beginning in order to expedite decisions, and identify and avoid potential problems. The approved IRM work plan is for removal of impacted soils. The discovery of buried drums is not addressed in the work plan and is a significant enough variation that EPA should have been notified. At a minimum, EPA would have been made aware of this development sooner if confirmation samples had been submitted in accordance with the work plan, prior to back filling the excavation.

For ongoing IRM activities at the site, EPA should be notified by phone or email within 24 hours of any unanticipated findings, such as buried drums, buried drains or pipes, or elevated concentrations of contamination in areas not identified for excavation in the initial work plan.




The approved work plan also states that the IRM schedule will be updated periodically throughout the project and that "updated schedules will be forwarded to KDHE and EPA every 2 weeks for the duration of the project." While EPA did receive some verbal schedule updates earlier in the project, EPA has not consistently received updated schedules for site activities. EPA understands that field work often involves unexpected complications and delays. Currently, field activities are approximately 3 to 4 months beyond the original schedule projections.

In addition to the confirmation sampling information for the area south of Building C, please submit an updated schedule for the remaining IRM activities at the site. Also provide in writing the date the drums west of the Paint pit excavation were discovered, a map of the associated confirmation samples, the confirmation sample data, and the date the excavation was backfilled. Please submit this information by March 23, 2015. If you anticipate a problem submitting this information by the 23<sup>rd</sup>, please contact me so we can discuss an acceptable time frame.

Chris Jump, L.G.  
Waste Remediation and Permitting Branch  
US EPA, Region 7  
[jump.chris@epa.gov](mailto:jump.chris@epa.gov)  
(913) 551-7141

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0.5', 2', 4'	DEPTH OF SAMPLE (ft)
121	TETRACHLOROETHENE MCL EXCEEDANCE (µg/kg)
120	TETRACHLOROETHENE BELOW MCL(µg/kg)
D2	QUADRANT IDENTIFICATION
	POSSIBLE SAMPLE LOCATION
	SAMPLE LOCATION
	SAMPLE LOCATION
NS	NOT SAMPLED
ND	NOT DETECTED
H	HOLDING SAMPLE RESULTS

## CLEAN HARBORS

PROJECT NAME  
SOIL SAMPLE RESULTS -  
TETRACHLOROETHENE  
SHEET TITLE

B.GERBER	B.WEAST	B.GERBER
PROJECT MGR.	DRAWN BY:	CHECKED BY:
3-12-2015	1311014	1 / 1
DATE	JOB NO.	SHEET/OF

**DRAFT**

